

EXHIBIT 2

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MAGNESIUM CORPORATION OF
AMERICA, *et al.*,

Debtors.

Chapter 7

Case No. 01-14312 (MKV)

(Jointly Administered)

**ORDER GRANTING FINAL APPLICATION OF BEUS
GILBERT PLLC, LITIGATION COUNSEL TO CHAPTER 7
TRUSTEE, FOR ALLOWANCE OF COMPENSATION**

Upon consideration of the final application of Beus Gilbert PLLC, as litigation counsel to Lee E. Buchwald, Chapter 7 Trustee of the above-captioned Debtors, for allowance of compensation (the "Application"); and sufficient notice having been given; and due consideration having been given to any response thereto; and sufficient cause having been shown therefor, it is hereby:

ORDERED that the Application is hereby granted to the extent set forth in the annexed Schedules.

Dated: _____, 2018
New York, New York

Honorable Mary Kay Vyskocil
United States Bankruptcy Judge

CURRENT FEE PERIOD

CASE NAME: MAGNESIUM CORPORATION OF AMERICA, et al.
CASE NO. 01 B 14312 (MKV)

Schedule A

Applicant	Application Date and Doc. No.	Interim Fees Requested in Application	Fees Allowed	Fees to be Paid for Current Fee Period	Fees to be Paid for Prior Fee Period(s)	Total Fees to be Paid	Interim Expenses Requested	Interim Expenses to be Paid for Current Fee Period
Beus Gilbert PLLC	9/15/03; ECF No. 417	\$88,026,158.86	\$88,026,158.86	\$88,026,158.86	\$0	\$88,026,158.86	\$0	\$0

DATE ON WHICH ORDER WAS SIGNED: _____, 2018

Initials: ____, USBJ

FINAL FEE APPLICATION TOTALS

CASE NAME: MAGNESIUM CORPORATION OF AMERICA, et al.
CASE NO. 01 B 14312 (MKV)

Schedule B

Applicant	Total Fees Requested	Total Fees Paid	Total Expenses Requested	Total Expenses Paid
Beus Gilbert PLLC	\$88,051,908.61	\$88,051,908.61	\$2,162,250.50	\$2,162,250.50

DATE ON WHICH ORDER WAS SIGNED: _____, 2018

Initials: _____, USBJ